

DEPARTMENT OF JUSTICE  
NATURAL RESOURCE DAMAGE PROGRAM



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June 14, 2018

Mr. Nikia Greene  
Remedial Project Manager  
U.S. EPA Region VIII – Montana Office  
Baucus Federal Building  
10 West 15th Street, Suite 3200  
Helena, Montana 59626

**Re: Butte Area One/ Parrot Tailings Removal Project: Letter of Intent to Abandon  
Groundwater Wells**

Dear Nikia:

This letter serves to provide all Butte Mine Flooding Operable Unit (BMFOU) and Butte Priority Soils Operable Unit (BPSOU) Superfund stakeholders proper notification of the State of Montana's intention to abandon the groundwater wells within the footprint of the Phase I removal boundary of the Parrot Tailings Waste Removal Project. In order to proceed with construction activities, the State will abandon the following groundwater wells: GS-41S, GS-41D, GS-45, GS-09-01, GS-09-02, GS-09-03, and BPS11-20. Because a two of these wells (i.e., GS-41S, and GS-41D) are a part of the Consent Decree Monitoring Program for BMFOU (EPA, 2002), and many make up a portion of the Interim Groundwater Monitoring Plan for BPSOU (EPA, 2011); the primary purpose of this letter is to provide adequate notification of abandonment.

All groundwater wells designated for abandonment will be abandoned according to the methodology and protocol established in the Parrot Tailings Waste Removal Project, Final Groundwater Well Abandonment/Replacement Work Plan, dated August 04, 2017. A draft copy of the work plan was submitted for agency review on May 16, 2017. Agency comments on the work plan were received on May 23, 2017, and NRDP response to Agency comments were provided on October 27, 2017. The final version of this document was provided to the agencies in Appendix A of the Butte Area One Parrot Tailings Removal Bid Package #1 – Phase I & IIA in March 2018.

The wells are tentatively scheduled to be abandoned between July 1-14, 2018. The wells will be

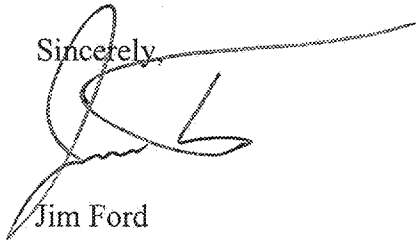
abandoned by the NRDP selected subcontractor, O' Keefe Drilling out of Butte, Montana. In order to ensure the wells are abandoned according to the work plan, a WET hydrogeologist or engineer will be onsite to provide construction oversight on these activities, and make sure the wells are abandoned according to the work plan.

The NRDP has one more quarterly Parrot PMP monitoring event scheduled prior to abandonment. The fourth quarterly PMP monitoring event is scheduled for June 26-27, 2018 for all wells north and east of Harrison Avenue (all hotspot, transect A, and transect B wells), and July 09-13, 2018 for all remaining wells to the south and west of Harrison Avenue. The NRDP will coordinate these activities with Atlantic Richfield, as previously agreed upon.

NRDP is aware of the presence of various Stakeholder monitoring equipment (i.e. pressure transducers); and therefore, the appropriate Atlantic Richfield, Montana Resources, Pioneer, TREC, and MBMG personnel have all been copied to open lines of communication and ensure that all equipment in the wells are removed, and that the sampling needs of all parties have been satisfied prior to abandonment. The NRDP will accommodate these entities in a reasonable capacity to ensure all needs are met prior to removal.

Please feel free to contact me if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Jim Ford", with a long horizontal stroke extending to the right.

Cc: Harley Harris (NRDP)  
Pat Cunneen (NRDP)  
Mary Capdeville (NRDP)  
Tom Stoops (DEQ)  
Daryl Reed (DEQ)  
Loren Burnmeister (Atlantic Richfield)  
Josh Bryson (Atlantic Richfield)  
Tim Hilmo (Atlantic Richfield)  
Mark Thompson (Montana Resources)  
Don Booth (BC)  
Tina Donovan (TREC)  
Alice Drew-Davies (TREC)  
Ted Duaine (MBMG)  
Gary Icopini (MBMG)